

Exhibit E

MARQUIS AURBACH COFFING
 10001 Park Run Drive
 Las Vegas, Nevada 89145
 (702) 382-0711 FAX: (702) 382-5816

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CRAIG R. ANDERSON, ESQ.
 Nevada Bar No. 6882
JOSHUA L. BENSON, ESQ.
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 Attorneys for Defendants LVMPD, Eager & Frederick

UNITED STATES DISTRICT COURT
STATE OF NEVADA

JOYCE ZAIC,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a political subdivision of the
 STATE OF NEVADA; DANIELLE PIEPER,
 individually; B. EAGER, P#6189, individually
 and in his official capacity as a police officer; T.
 FREDERICK, P#9793, individually and in his
 official capacity as a police officer; SUNRISE
 MOUNTAIN VIEW HOSPITAL, INC.; NEAL,
 a security guard for MOUNTAIN VIEW
 HOSPITAL; CHRISTOPHER SIMMS, security
 guard for MOUNTAIN VIEW HOSPITAL;
 JOHN DOES I through X and ROE
 INSTITUTIONS I through X, inclusive,

Defendants.

Case No: 2:10-cv-01814-PMP-LRL

**DEFENDANTS LAS VEGAS METROPOLITAN POLICE DEPARTMENT, B. EAGER
 AND T. FREDERICK'S REQUESTS FOR ADMISSIONS TO DEFENDANT DANIELLE
 PIEPER**

Pursuant to FRCP 36 Defendants, by and through their attorney of record, Craig R. Anderson, Esq. and Joshua L. Benson, Esq., of the law firm of Marquis Aurbach Coffing, hereby request that Defendant Danielle Pieper respond in writing and serve upon the undersigned counsel for Defendants, within thirty (30) days of the date of service thereof, her responses to this Request for Admissions set forth below.

ADMISSIONS

REQUEST NO. 1:

Admit that the Voluntary Statement attached hereto as Exhibit 1 is a true, correct and authentic copy of the Voluntary Statement regarding the incident described in Plaintiff's Complaint.

REQUEST NO. 2:

Admit that signed the document attached hereto as Exhibit 1.

DATED this 16th day of March, 2011.

MARQUIS AURBACH COFFING

By 

Craig R. Anderson, Esq.

Nevada Bar No. 6882

Joshua L. Benson, Esq.

Nevada Bar No. 10514

10001 Park Run Drive

Las Vegas, Nevada 89145

Attorneys for Defendants LVMPD, Eager & Frederick

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MARQUIS AURBACH COFFING

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Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CERTIFICATE OF MAILING

I hereby certify that on the 16th day of March, 2011, I served a copy of the foregoing
*DEFENDANTS LAS VEGAS METROPOLITAN POLICE DEPARTMENT, B. EAGER AND
T. FREDERICK'S REQUESTS FOR ADMISSIONS TO DEFENDANT DANIELLE
PIEPER* upon each of the parties by depositing a copy of the same in a sealed envelope in the
United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and addressed to:

Cal J. Potter, III, Esq.
John C. Funk, Esq.
Potter Law Offices
1125 Shadow Lane
Las Vegas, Nevada 89102
Attorney for Plaintiff

Raymond R. Gates, Esq.
Anthony D. Lauria, Esq.
1755 Creekside Oaks Drive, Suite 240
Sacramento, CA 95833
Attorneys for Defendant Pieper

Michael E. Prangle, Esq.
Hall, Prangle & Schoonveld, LLC
777 North Rainbow Blvd., Ste. 225
Las Vegas, Nevada 89107
Attorneys for Defendant Sunrise Hospital

and that there is a regular communication by mail between the place of mailing and the place(s)
so addressed.

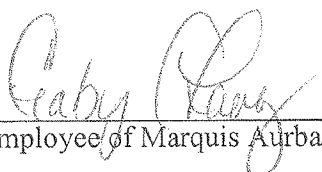

An employee of Marquis Aurbach Coffing

EXHIBIT 1

Page 1 of 2LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENTEvent # 080321-2810

THIS PORTION TO BE COMPLETED BY OFFICER		
Specific Crime <u>BATTERY</u>	Date Occurred <u>3-21-08</u>	Time Occurred <u>2000</u>
Location of Occurrence <u>3100 N TENNEYA LV NV 89129</u>	Sector/Beat <u>V6</u>	<input checked="" type="checkbox"/> City <input type="checkbox"/> County

Your Name (Last / First / Middle) <u>X Pieper / Danielle / K</u>		Date of Birth <u>5/16/72</u>	Social Security #
Race <u>African</u>	Sex <u>F</u>	Height <u>5'3</u>	Weight <u>120</u>
Hair <u>Brown</u>	Eyes <u>Brown</u>	Work Sched. (Hours) <u>M-F</u>	(Days Off) <u>Sat/Sun</u>
Residence Address: (Number & Street)		Bldg./Apt. #	City
		State	Zip Code
Bus. (Local) Address: (Number & Street)		Bldg./Apt. #	City
<u>200 Lewis Ave</u>			<u>LV NV 89101</u>
Best place to contact you during the day <u>WORK</u>		Best time to contact you during the day <u>ANY</u>	
Res. Phone:		Bus. Phone: <u>641-2675</u>	
Occupation		Depart Date (if visitor)	
Can You Identify <input checked="" type="checkbox"/> Yes the Suspect? <input type="checkbox"/> No			

X DETAILS On March 21, 2008 at approximately 8:15 pm, I went w/ my fiancée Steve Zaric, to Mt. View Hospital to visit his father Frank Zaric in the ICU. I walked into his room and Steve's sister, Joyce Zaric, yelled out, "who the fuck is that, Steve?" Steve said, "Joyce, calm down that's my fiancée Dani." Joyce then said, "She needs to get the fuck out of the room. I only want family in here." Steve said, "calm down, Joyce". Joyce then came up to me as I was standing on the side of Frank's bed. She was about 2ft. from my face and said, "get the fuck out of the room, you don't belong here." I then looked at her. She again said, "get the fuck out of the room, you don't belong here." I continued to look at her, then she said, "get that →"

I HAVE READ THIS STATEMENT AND I AFFIRM TO THE TRUTH AND ACCURACY OF THE FACTS CONTAINED HEREIN. THIS STATEMENT WAS COMPLETED AT (LOCATION) 3100 N TENNEYA ON THE 21 DAY OF MARCH AT 930 (AM / PM) 2008.

Witness/Officer: Danielle K. Pieper

(SIGNATURE)

Witness/Officer: B. EAGLE
LVMPD 85 (REV. 5-00) (PRINTED)P# 6159X [Signature]
SIGNATURE OF PERSON GIVING STATEMENT

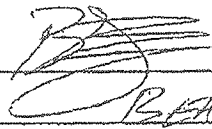
LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT CONTINUATIONPage 2 of 2Event #: 080321-2810

"fucken smile off you face". The whole time she is yelling at me. She's pointing her finger in my face. Then she comes right up to my face and draws back her breath and I see spit in her mouth. She then is about to spit on me and I turn my head. Then she pushes me on the left shoulder and I step back and then she says, "get the fuck out... you are not family". then I turn away from her and I feel a blow to the ~~left side~~ right side of my neck, and I realized that she hit me. Steve then comes around the bed and gets in between myself and Joyce. I am cornered b/w Steve's father's bed and Steve in front of me. Joyce is screaming, "get her the fuck out of the room". The whole time she is yelling. She is trying to get to me by lunging and pushing past Steve. She looked like a wild dog that had rabies. She's pointing her finger and yelling, "get the fuck out"... She continues to lunge ~~at~~ at me and Steve pushes her back and she falls to the ground and ~~is~~ yells. The nursing staff comes over and we waited for Metu.

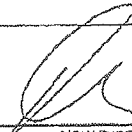
Witness:

Witness:

LVMPD 88 (REV. 3-01)



B. BARKER 6189



SIGNATURE OF PERSON GIVING STATEMENT

Danielle Kieper

PRINT NAME OF PERSON GIVING STATEMENT

Raymond R. Gates, Nevada Bar No. 5320
 Anthony D. Lauria, Nevada Bar No. 4114
 LAURIA TOKUNAGA
 GATES & LINN, LLP
 1755 Creekside Oaks Drive, Suite 240
 Sacramento, CA 95833
 Tel: (916) 492-2000
 Fax: (916) 492-2500

Attorneys for Defendant DANIELLE K. PIEPER

UNITED STATES DISTRICT COURT

STATE OF NEVADA

* * * * *

JOYCE ZAIC,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a political subdivision of the
 STATE OF NEVADA; DANIELLE PIEPER,
 individually and in her official capacity as a
 deputy district attorney; B. EAGER, P#6189,
 individually and in his official capacity as a
 police officer; T. FREDERICK, P#9793,
 individually and in his official capacity as a
 police officer; SUNRISE MOUNTAIN VIEW
 HOSPITAL, INC.; NEAL, security guard for
 MOUNTAIN VIEW HOSPITAL; JOHN DOES I
 through X and ROE CORPORATIONS I through
 X, inclusive,, et al.,

Defendants.

CASE NO. 2:10-cv-01814-PMP-LRL

DEFENDANT DANIELLE PIEPER'S RESPONSE TO DEFENDANTS

LAS VEGAS METROPOLITAN POLICE DEPARTMENT, B. EAGER AND

T. FREDERICK'S REQUESTS FOR ADMISSIONS

COMES NOW Defendant, DANIELLE PIEPER and hereby responds to
 Defendants, Las Vegas Metropolitan Police Department, B. Eager and T. Frederick's,
 Request for Admissions as follows:

REQUEST NO. 1: Admit that the Voluntary Statement attached hereto as Exhibit 1 is a
 true, correct and authentic copy of the Voluntary Statement regarding the incident
 described in Plaintiff's Complaint.

Route to:	CA-11B-
File No.:	51106-451
Amicus:	
Calendared by:	

1 RESPONSE TO REQUEST NO. 1: Admit.

2 REQUEST NO. 2: Admit that (sic) signed the document attached hereto as Exhibit I.

3 RESPONSE TO REQUEST NO. 2: Admit.

4 Dated: April 8, 2011

5 LAURIA TOKUNAGA
6 GATES & LINN, LLP

7 By  #83246
8 RAYMOND R. GATES
9 Nevada Bar No. 5320

10 Reply To: 1755 Creekside Oaks Drive, Suite 240
11 Sacramento, CA 95833
12 (916) 492-2000
13 Attorneys for Defendant DANIELLE K.
14 PIEPER

15 Nevada Office:
16 601 South Seventh Street
17 Las Vegas, NV 89101
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CERTIFICATE OF MAILING

Pursuant to NRCP 5(b), I certify that the forgoing DEFENDANT DANIELLE
PIEPER'S RESPONSE TO DEFENDANTS LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, B. EAGER AND T. FREDERICK'S REQUESTS FOR ADMISSIONS was
served by mailing a copy thereof, first class mail, postage prepaid, on the 8th day of
April, 2011, addressed as follows:

John C. Funk, Esq.
Potter Law Offices
1125 Shadow Lane
Las Vegas, NV 89102

Casey W. Tyler, Esq.
Hall Prangle & Schoonveld, LLC
777 N. Rainbow Blvd., Ste. 225
Las Vegas, NV 89101

Joshua Benson, Esq.
Marquis and Aurbach
10001 Park Run Drive
Las Vegas, NV 89145
T: (702) 382-0711; F: (702) 856-8912


an employee of Lauria Tokunaga
Gates & Linn, LLP
1169/6164